

PS1602.03 LIFE SAFETY AND FIRE PROTECTION REVIEW PROGRAM



U.S. Department of Justice  
Federal Bureau of Prisons

Program

Statement

**OPI:** HSD  
**NUMBER:** 1602.03  
**DATE:** June 16, 1997  
**SUBJECT:** Life Safety and Fire Protection  
Review Program

1. PURPOSE AND SCOPE. To provide guidelines outlining the responsibilities and authority of the Life Safety Reviewing Officials, the Authority Having Jurisdiction (AHJ), and other Bureau personnel who have responsibility for any of the following: fire protection and life safety survey reports; the life safety database; plans of action, variance requests; or providing guidelines for fire protection and life safety review of previously-owned facilities, renovation projects, or construction of new structures.

AHJ refers to the Assistant Director, Health Services Division.

2. PROGRAM OBJECTIVES. The expected results of this program are:

a. Consistently applied, cost-effective fire protection and life-safety improvements will be developed in all Bureau facilities.

b. The requirements of applicable Life Safety Codes will be met.

3. DIRECTIVES AFFECTED

a. Directive Rescinded

PS 1602.02 Life Safety and Fire Protection Review  
Program (06/08/94)

b. Directives Referenced

PS 1600.07 Occupational Safety and Environmental Health  
Manual (05/30/96)  
PS 4200.09 Facilities Operations Manual (02/03/96)

4. STANDARDS REFERENCED

a. American Correctional Association 3rd Edition Standards for Adult Correctional Institutions: 3-4120, 3-4121, 3-4199.

b. American Correctional Association 3rd Edition Standards for Adult Local Detention Facilities: 3-ALDF-2A-01, 3-ALDF-2A-02, 3-ALDF-3B-01.

c. American Correctional Association 2nd Edition Standards for Administration of Correctional Agencies: 2-CO-3B-01.

d. American Correctional Association Standards for Adult Correctional Boot Camp Programs: 1-ABC-2A-01, 1-ABC-2A-03, 1-ABC-3B-01

e. National Fire Protection Association, NFPA, National Fire Codes (NFC) and NFPA 101, the Life Safety Code.

5. RESPONSIBILITIES. The following Life Safety Reviewing Officials shall review and recommend for the AHJ's approval, Plans of Action, variance requests, and any additional fire protection and life safety functions deemed necessary.

a. Facility Managers

- (1) Coordinate with the Safety Manager to have a department representative accompany the survey team throughout the institution.
- (2) Review preliminary survey report and database for discrepancies (including cost estimates) and make comments to the National Safety Administrator through the Warden within 30 days of receipt of report.
- (3) Maintain primary control of project activity and funding, monitor each project's use of funds, and maintain a current database status report on the institution's Plan of Action (which must be submitted in accordance with the Facilities Operations Manual).
- (4) Enter institution responses to recommendations into the database.
- (5) Review Plan of Action variance requests.
- (6) Identify areas to the Safety Manager that may require variance requests and comments as needed after the Plan of Action has been approved.

b. Safety Managers

- (1) Coordinate schedules with the engineering firm, Regional Safety Administrator, and institution staff for survey time frames.

- (2) Review discrepancies in the preliminary survey report and database as noted by the Facility Manager.
- (3) Monitor and inspect project activities for completion and NFC compliance. Review and sign quarterly status reports of the Plan of Action.
- (4) Research and prepare variance requests.
- (5) Review the database portion of the draft Plan of Action.

c. Wardens

- (1) Be present for in-briefing, on-site survey, and close-out meeting(s) with the engineering firm, Regional Safety Administrator, Safety Manager, and Facility Manager or designee. Acknowledge the list of discrepancies in the preliminary survey report.
- (2) Forward all discrepancies (or note that no discrepancies have been found) and comments on the Fire Protection and Life Safety Survey Preliminary Report Discrepancy form (Attachment A) to the National Safety Administrator within 30 days of receipt of the preliminary survey.
- (3) Review institution responses and variance requests for all recommendations in the final survey report. Request approval for the draft Plan of Action from the AHJ through the Regional Office within 60 days of receipt of the final survey report (Attachment A).
- (4) Review requests for variance approval and forward all necessary materials through the Regional Office to the AHJ.

d. Regional Safety Administrators

- (1) Coordinate Regional Office activities with the engineering firm and institution Safety Managers to ensure all required individuals are present at the survey.
- (2) Review discrepancies in the preliminary survey report and database.
- (3) Review quarterly status reports of the Life Safety Plan of Action have been identified and are justified.
- (4) Provide technical resources for variance requests and review suitability of all proposed corrective actions.

- (5) Review all database material.

e. Regional Facilities Administrators

- (1) Review preliminary survey report and database for discrepancies (including cost estimates) and comments on Attachment A to the National Safety Administrator through the Regional Director within 30 days of receipt at the Regional Office.
- (2) Maintain updated quarterly status reports of all approved Plans of Action and forward copies of Plan of Action status reports to the Chief, Facilities Operations, in the approved database format by the 25th day of October, January, April, and July.
- (3) Review all database material (including funding requests) and ensure that all recommendations have been identified and are justified.
- (4) Review variance requests and suitability of proposed corrective actions. Review variance requests concerning funding as needed.

f. Regional Directors

- (1) Acknowledge in the preliminary survey report following the reviews of the Regional Facilities Administrator and the Regional Safety Administrator. Forward all discrepancies (or note that no discrepancies were found) on Attachment A to the AHJ within 30 days of receipt of the preliminary survey report.
- (2) Review and submit for approval or comment all variance requests to the Chief, Facilities Programs, within 30 days of receipt from individual institutions.

g. Chief, Facilities Programs

- (1) Forward all discrepancies (or note that no discrepancies have been found) on Attachment A to the National Safety Administrator within 30 days of receipt of the preliminary survey report.
- (2) Develop a life safety status report for the Assistant Director, Administration, by the 25th day of the second month of each quarter. This report identifies overall completion percentages, funding obligations, and individual compliance with approved Plans of Action.
- (3) Determine whether correct and sufficient information has been entered into the database portion of the draft Plan of Action.

If the information is correct and sufficient, the Chief, Facilities Programs, shall approve or comment upon the database material and forward it to the National Safety Administrator within 30 days of receipt.

If the information is not correct or sufficient, all materials must be returned to the Regional Office with an explanation within 30 days of receipt.

- (4) Review and submit for approval or comment on all variance request. Forward all materials to the National Safety Administrator within 30 days of receipt.

h. National Safety Administrator

- (1) Determine whether the Correctional Services Administrator must review the preliminary survey report or the draft Plan of Action (for security issues). If so, forward a copy requesting that it be reviewed and returned with comments, within 30 days.
- (2) Coordinate distribution of and retain copies of all Preliminary Report Discrepancy Forms to be sent to the engineering firm within 30 days of receipt of the final submittal.
- (3) Determine whether sufficient information is included in the draft Plan of Action or variance requests. If not, return materials with an explanation within 30 days of receipt.

i. Fire Protection Engineer

- (1) Review the preliminary survey report for compliance with the NFC, standard fire protection engineering practices, and Bureau policy, and note any discrepancies on Attachment A within 30 days of receipt of the preliminary report from the engineering firm.
- (2) Review all corrective actions in the draft Plan of Action and variance requests for compliance with the NFC, standard fire protection engineering practices, and Bureau policy, and present comments to the National Safety Administrator within 30 days of receipt.

j. AHJ (Assistant Director, Health Services Division)

- (1) Review and approve all materials presented as part of the draft Plan of Action. Determine what changes must be made in a draft Plan of Action to approve it.

- (2) Review and approve (or disapprove) judgments on all material presented as part of the variance requests.

6. FIRE PROTECTION AND LIFE SAFETY SURVEY REPORTS

a. Process. The process shall include:

- ! A coordinated effort between Bureau personnel and a qualified fire protection engineering consulting firm to provide on-site surveys and subsequent reports through a national contract. Refer to the Facilities Operations Manual for the definition of "qualified."
- ! A review of preliminary survey reports and databases by institution, regional, and Central Office personnel.
- ! Incorporation of the comments and concerns of Bureau staff into the final survey report and database.

b. Report Distribution and Review. After institutions are surveyed under a national contract, the preliminary reports and databases shall be distributed to regional, institutional, and Central Office personnel for their review.

Upon receiving a preliminary report, reviewers shall send comments or questions to the National Safety Administrator within 30 days. These are to be compiled and forwarded to the fire protection engineering firm before the final draft is issued (see Attachment A).

- ! Reviewers shall identify all areas that are questionable about the consultant's findings and deficiencies (not recommendations).

c. Plan of Action. Once the engineering firm issues the final survey report, each institution must develop a draft Plan of Action addressing all recommendations.

d. Local or Regional Contracts. Institutions or Regional Offices that wish to contract separately for fire protection of life safety survey services shall use the selection criteria developed for the national contract.

Full surveys shall include reports and databases in standard software format, as approved by the Chief, Facilities Operations, and must be completed in accordance with national contract standards.

Surveys shall include, but not be limited to:

- ! lists of deficiencies certified by a qualified Fire Protection Engineer (FPE),

- ! recommendations provided in standard Bureau format, and
- ! cost estimates from Mean's Cost Estimating Guide.

7. LIFE SAFETY DATABASE. Facility Managers shall maintain the Life Safety Database and initiate the draft Plan of Action.

The Facilities Branch, Central Office, shall transmit to each Regional Office a national Life Safety Database report format; no other format is authorized. This database shall contain most of the information presented as the draft Plan of Action.

a. The Facility Manager shall incorporate survey report findings and updates into the Life Safety Database, including:

- ! The review of all recommendations made by the engineering firm.
- ! All planned corrective actions and updates.
- ! Any database review conducted by the Safety Manager and Associate Warden, including the Warden's approval.

b. The institution Facility Manager, with the Safety Manager's assistance, must enter proposed responses to all recommendations into the database.

Any alternate recommendations the engineering firm provided with which the institution proposes to comply must be clearly identified in the narrative section as "Alternate Recommendation."

c. The first entry in the narrative section shall contain the institution's response to all recommendations, including:

- ! will comply,
- ! cannot comply due to Bureau policy,
- ! will not comply due to demolition of the area, etc.

Variance requests are required when an institution requests not to comply with a corrective action recommendation.

d. When the institution plans to comply fully with the corrective action it is unnecessary to restate the recommendation in the narrative section. Care should be exercised, however, to designate which institution policy applies for recommendations concerning locking, emergency response plans, etc.

e. Additional entries, when needed, shall detail the condition of the corrective action projects in the narrative section.

Examples: under contract, rationale for variance request, Y4D Project, etc. If the cost of corrective action for a recommendation exceeds the estimate provided by the engineering firm, an explanation must be included in the narrative section.



f. The Safety Manager and Facility Manager shall review the status of the items in the Plan of Action and note any changes directly on the printout (project completed, 50 percent completed, project start date, etc.).

g. Progress of Life Safety projects shall be reported in accordance with the Facilities Operations Manual.

Program Review teams from both the Safety and Facilities branches shall evaluate progress of each Plan of Action as part of scheduled Program Reviews.

8. FIRE PROTECTION AND LIFE SAFETY PLANS OF ACTION. For each completed survey report, a draft Plan of Action must be submitted and approved.

a. Institutions have 60 days after receiving the final survey report to request approval of a draft Plan of Action that shall include:

- ! A complete Plan of Action Approval Request form (Attachment B) from the institution to the AHJ, including planned corrective actions and variance requests for all recommendations.
- ! A list of all variance requests or corrective actions planned by the institution for all recommendations in the final survey report.
- ! Adequate information describing the reason(s) for requesting a variance for each recommendation the institution would like to modify.
- ! Approvals or comments from the Safety Manager, Facility Manager, Associate Warden(s), Warden, Regional Safety Administrator, Regional Facilities Administrator, Regional Director, Chief, Facilities Programs, Fire Protection Engineer, and National Safety Administrator.

b. Regional staff, and then appropriate Central Office Life Safety Review Members, shall review the draft Plan of Action, with the AHJ granting final approval (including any necessary changes).

All final decisions, along with copies of Life Safety Review Members' comments and concerns, shall be sent to regional and institutional personnel as well as the Chief, Facilities Programs. Copies of approved Plans of Action shall be sent to the Chief, Facilities Programs, Central Office.

c. Incomplete or incorrect draft Plans of Action are invalid and shall be returned for correction. No credit shall be given on quarterly reports until the AHJ approves the draft plan.

d. Once the AHJ has approved the institution's Plan of Action, intended corrective actions shall not be altered unless a variance request has been approved. Any additional recommendations not included in the approved Plan shall not receive funding, in accordance with the Facilities Operations Manual.

e. The approved Plan of Action shall remain in effect until all corrective actions have been completed and the institution requests closure from the AHJ through the Regional Office.

9. VARIANCE REQUESTS. Variance requests are required when an institution requests not to comply with a corrective action recommended in the final report, and when an institution disagrees with any Bureau fire protection and life safety policy or directive (Operational and Program Reviews, appropriate sections of the Occupational Safety and Environmental Health Manual and Facilities Operations Manual, NFPA Codes and standards, etc.).

a. Requests for variance shall be made on the Fire Protection and Life Safety Variance Request Form (Attachment C) and include:

- (1) Origin of the proposed corrective action information. (Institution, region, survey date/program review date, location, deficiency number and page, deficiency description, recommendation number, priority number and page, and recommendation description.)
- (2) Circumstances surrounding the request. (Detailed rationale and background information.)
- (3) Approvals or comments from the: Safety Manager; Facility Manager; Associate Warden(s); Warden; Regional Safety Administrator; Regional Facilities Administrator; Regional Director; Chief, Facilities Programs; Fire Protection Engineer; and National Safety Administrator.

b. If circumstances require a revision of the Plan of Action for other than funding constraints, the Warden must submit a variance request through the Regional Director to the AHJ. A copy of all variance judgments shall be sent to the Chief, Facilities Programs, Central Office.

c. Variance requests included in the draft Plan of Action shall adequately detail the reason for the requests. Requests without adequate information shall not be considered.

d. If Regional or Central Office personnel disagree with a request, they must explain their reasons for recommending denial.

e. If buildings have been completely demolished, variance requests for recommendations for those buildings shall be approved by the Regional Facilities Administrators.

10. ACQUISITION OF PROPERTY AND CONSTRUCTION REQUIREMENTS

a. New Facilities, Alterations and Renovations

- (1) Review and approval of design drawings and specifications for altering use conditions or occupancy classifications or for constructing new structures shall be made by a qualified fire protection engineer as required by the Facilities Operations Manual.
- (2) A post construction certification shall be provided in accordance with the provisions of the Facilities Operations Manual.
- (3) On small scale renovation or construction projects that do not impact life safety or fire protection, the Regional Facilities Administrator has the authority to suspend pre- and/or post-reviews for life safety and fire protection. A copy of the justification to suspend life safety and fire protection reviews shall be filed in the project folder.

b. Surplus Property/Converted Use Facilities. All buildings converted for Bureau use must undergo a fire protection and life safety survey by a qualified fire protection engineer as defined by the Facilities Operations Manual. Survey reports shall comply with the provisions of Section 5.d. above.

c. Equivalency Approval. The AHJ must approve, in advance, any application of equivalency concepts for determining the level of life safety in Bureau buildings and structures.

\s\  
Kathleen M. Hawk  
Director

**FIRE PROTECTION AND LIFE SAFETY SURVEY  
PRELIMINARY REPORT DISCREPANCY FORM - INSTITUTION**

Institution: \_\_\_\_\_ Date: \_\_\_\_\_  
Survey Dates: \_\_\_\_\_  
Report Date: \_\_\_\_\_  
Page: \_\_\_\_\_  
Entry into the Preliminary Survey Report: \_\_\_\_\_

Discrepancy: \_\_\_\_\_

Page: \_\_\_\_\_  
Entry into the Preliminary Survey Report: \_\_\_\_\_

Discrepancy: \_\_\_\_\_

(Additional discrepancies may be placed on following pages)

Warden/Superintendent { } No discrepancies have been  
Date noted in the preliminary  
report.

Associate Warden(s) Date

Facilities Manager Date

Safety Manager Date

Page:  
Entry into the Preliminary Survey Report:

Discrepancy:

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Page:  
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**FIRE PROTECTION AND LIFE SAFETY DRAFT  
PLAN OF ACTION APPROVAL REQUEST**

Institution:

Region:

Date:

Survey Date:

Final Report Date:

)

Recommendations from Regional and Central Office Personnel to the AHJ:

(Additional comments may be placed on following pages)

)

)

Warden/Superintendent

)

Date

Regional Director

Date

)

Associate Warden(s)

)

Date

Regional Facilities Admin. Date

)

Facilities Manager

)

Date

Regional Safety Admin.

Date

)

Safety Manager

Regional Recommendation to AHJ;  
Date { } Approval { } Denial  
(Requires  
Documentation)

)

Chief, Facilities Programs Date

)

National Safety Admin.

Central Office Recommendation  
Date to AHJ;  
{ } Approval { } Denial

(Requires  
Documentation)

)

Fire Protection Engineer Date

# FIRE PROTECTION AND LIFE SAFETY VARIANCE REQUEST FORM

Institution: \_\_\_\_\_ Region: \_\_\_\_\_  
 Date: \_\_\_\_\_  
 Survey Date/Program Review Date: \_\_\_\_\_  
 Recommendation Number: \_\_\_\_\_ Priority Number: \_\_\_\_\_  
 Recommendation: \_\_\_\_\_

Deficiency Number:  
Page:  
Deficiency:  
Request Circumstances:

(Additional comments may be placed on following pages)

Warden/Superintendent \_\_\_\_\_ Date \_\_\_\_\_ Regional Director \_\_\_\_\_ Date \_\_\_\_\_

Associate Warden(s)	Date	Regional Facilities Admin. Date
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Facilities Manager \_\_\_\_\_ Date \_\_\_\_\_ Regional Safety Admin. \_\_\_\_\_ Date \_\_\_\_\_

Regional Recommendation to AHJ;  
 Date { } Approval { } Denial  
 (Requires Documentation)

)  
Chief, Facilities Programs Date

) National Safety Admin. Central Office Recommendation  
 Date to AHJ;  
 { } Approval { } Denial  
 ) (Requires Documentation)

Fire Protection Engineer      Date